

June 7, 2007

RE: William Cody v. Department of Corrections  
Allocation Review Request 06AL0092

Dear Mr. Cody:

On March 22, 2007, I conducted a Director's review meeting at the Department of Personnel, 2828 Capitol Boulevard, Olympia, Washington, concerning the allocation of your position. Present at the Director's review meeting were you and Georgia Knowlen and Joanne Harmon, Human Resource Consultants representing the Department of Corrections (DOC).

### **Background**

On December 14, 2005, you requested that the Human Resources (HR) Office at the Washington Corrections Center for Women (WCCW) conduct a desk audit of your Locksmith position #GC81. On April 20, 2006, Ms. Knowlen and Ms. Harmon conducted a desk audit of your position. At that time, you indicated the Classification Questionnaire (CQ) on file for your position, dated November 4, 2004, was an accurate description of your duties. However, you also indicated that a Supervisor Locksmith or Detention Locksmith would better describe your position because of the skill set required for the work you perform. In summary, your HR consultants concluded that while you are a highly capable, valued employee with extensive knowledge regarding locks and locking devices, the Locksmith classifications you requested did not exist within the state system. As a result, DOC's HR Office determined the Locksmith classification best encompassed the duties and responsibilities of your position.

### **Summary of Mr. Cody's Perspective**

You assert the locksmith duties you perform go beyond the level of basic locksmith skills identified in your current classification as a Locksmith. You contend your position was brand new when you began nearly four years ago and assert it has evolved over time. For example, you state that you now perform duties that once belonged to three other employees, including a plant mechanic, electrician, and low-voltage technician. Further,

you state you have taken on tasks related to key control and that you act as the process owner of security, which at one time had been divided between five different employees.

As such, you contend you perform maintenance and repairs on a fully automatic and hydraulic lock system that, for security reasons, requires certification as a detention locksmith. You also note that DOC sent you to detention technician training, which was conducted by the manufacturing company (Southern Steel) for the hydraulic lock system at the institution, so the department would not need to contact a factory technician for repairs. You assert the security at WCCW depends on your ability to monitor, repair, and maintain the fully automated hydraulic system, and as a result, you believe your position should be reallocated to a higher-level position.

### **Summary of the Department of Corrections' (DOC's) Reasoning**

DOC states that a desk audit was completed at WCCW, which included interviews with you, your supervisor, Plant Manager Denise Carron, and the Key Control Captain. DOC further asserts the HR Department reviewed your CQ and believes you essentially agreed with the content stated on the CQ. DOC acknowledges that you implement and perform maintenance on the detention locking system at WCCW, performing work as a skilled locksmith. As such, DOC recognizes that you inspect, repair, install, and construct the mechanical/electrical detention locking system and use key making machines and tools. DOC further acknowledges you control the inventory of all keys, including active and inactive, restricted, master, and vehicle locks, and that you have the responsibility for ordering key blanks and related materials.

However, DOC contends the department can only allocate a position to a class within the state's classification system. In the case of your position, DOC asserts that only the Locksmith and Locksmith Supervisor classes best fit your duties and responsibilities and contends you do not supervise other employees. While DOC recognizes you are a high performer with an exemplary record, the department asserts the duties assigned to your position best fit the Locksmith classification.

### **Director's Determination**

This position review was based on the work performed at the time of and prior to the desk audit of your position on December 14, 2005.

As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review meeting, and the verbal comments provided by both parties. Based on my review and analysis of your assigned duties and responsibilities, I conclude your position is properly allocated to the Locksmith classification.

### **Rationale for Determination**

As previously mentioned, the duties on your CQ (Exhibit 7) include the following:

- Create, implement and maintain preventative maintenance plan, tracking maintenance tasks for all detention locking systems;
- Perform skilled locksmith work in inspection, corrective maintenance, repairs, installation, and construction of mechanical/electrical detention locking systems, including keys, door closures, panic hardware, and high-security sliding doors and locking devices;
- Operate key duplicating machines and other equipment;
- Control inventory of all keys, locks, key blanks, and key making machines and tools;
- Responsible for ordering key blanks, locks, parts and other related equipment, as well as disposing of damaged keys/locks;
- Analyze and repair all electric door opening/locking devices, including keyless touch-pad entry systems.
- Train designated maintenance staff to perform emergency backup locksmith functions;
- Maintain Key Vault and Key Control functions under direction of Key Control Manager;
- Manage and maintain computerized master key control.

During the Director's review meeting, you provided a number of examples of descriptions you believe adequately portray your job and the duties you perform. You also provided suggested job titles. Additionally, you provided extensive information about the hydraulic detention systems you manage and demonstrated various locking systems. It is obvious you have extensive knowledge and expertise regarding complex locking systems, and the packet of information and demonstrations provided good illustrations of your work and responsibilities.

As we discussed in our meeting, however, the allocation review process is not the proper forum to rewrite or create a new classification. Rather, a proposal for a new or revised classification is a matter that should be discussed with your union representative and agency's HR staff. You can find more information about submitting a proposal on the Department of Personnel's webpage at [www.DOP.wa.gov](http://www.DOP.wa.gov) under the HR Professionals tab.

Again, a position's allocation is based on the assigned duties and responsibilities and how they best match the available job classifications. The Locksmith classifications available during the time period relevant to your request include the Locksmith and Locksmith Supervisor. The Locksmith class defines the position as performing "skilled locksmith work in the repair, installation, and construction of locks and locking devices; makes keys."

Further, the typical work examples, while not allocating criteria, lend support to the type of work performed. The Locksmith class specification provides examples of work similar to the work assigned to your position, including making and issuing keys; maintaining records of key assignments; repairing, inspecting, ordering key blanks and lock parts; maintaining master key systems; and using lock-related tools and equipment.

While I considered the Locksmith Supervisor classification, the definition states the incumbent must supervise locksmiths and/or trade helpers in addition to performing skilled locksmith work. Because your position is not assigned supervisory duties, you do not meet the definition for the Locksmith Supervisor class. Although I reviewed the information you submitted regarding supervision (Exhibit 14), this section of the Classification and Pay Guide refers to the level of supervision needed by an employee, not whether the definition of a supervisor is met. The Classification and Pay Guide defines a supervisor as follows:

An employee assigned responsibility by management to participate in all of the following functions with respect to their subordinate employees: (1) selection of staff, (2) training and development, (3) planning and assignment of work, (4) evaluation performance, (5) adjusting grievances, and (6) taking corrective action. Participation in these functions must not be of a merely routine nature but requires the exercise of individual judgment.

The class specifications related to Higher Education were part of a separate system during the timeframe of this review. Therefore, they were not classes that could be considered for your position's allocation.

During the Director's review meeting, Ms. Knowlen and Ms. Harmon reiterated their beliefs that you are a highly capable, skilled locksmith, and you are a valuable asset to the WCCW. At this time, however, the Locksmith classification best describes your position #GC81.

### **Appeal Rights**

WAC 357-49-018 provides that either party may appeal the results of the Director's review to the Personnel Resources Board (board) by filing written exceptions to the Director's determination in accordance with Chapter 357-52 WAC.

WAC 357-52-015 states that an appeal must be received in writing at the office of the board within thirty (30) calendar days after service of the Director's determination. The

address for the Personnel Resources Board is 2828 Capitol Blvd., P.O. Box 40911, Olympia, Washington, 98504-0911.

If no further action is taken, the Director's determination becomes final.

Sincerely,

Teresa Parsons  
Director's Review Supervisor  
Legal Affairs Division

c: Georgia Knowlen, DOC  
Joanne Harmon, DOC  
Lisa Skriletz, DOP

Enclosure: List of Exhibits